

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-H and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to prosecute these actions against them.

Respectfully:

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Barbara R. Binis

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Dated: September 2, 2015

EXHIBIT A - DOYLE LOWTHER

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-08237	Penny Shoffner v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B - THE LAW OFFICES OF JEFFREY S. GLASSMAN

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-cv-27492	Anjela N. Schieving, Bryce A. Schieving v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT C – KELL LAMPIN

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-cv-29578	Tina Hopster, Duane Hopster v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation

EXHIBIT D - THE LANIER LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-cv-06914	Cynthia Ross, Ken Ross v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-cv-14160	Linda Sistos v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT E- MOTLEY RICE

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-03894	Wilma Jean Petersen, Terry Herman Petersen v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT F - SIMMONS HANLY CONROY

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-cv-02908	Cynthia Cann, James Cann v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT G - WATERS & KRAUS

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-11918	Aracelia G. Brazas v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-cv-15826	Marie-Celine Harrington, Roland Harrington, Jr. v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT H - WEXLER WALLACE

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-cv-22491	Cathy L. Thompson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis